

Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: November 16, 2018
Hearing Time: 11:00 a.m.

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT, LLC,
Debtor.

Case No. 16-11767-CMA

DECLARATION OF CLASS COUNSEL
CONCERNING NO OPT-OUTS OR
OBJECTIONS TO THE CLASS ACTION
SETTLEMENT OF WARN ACT CLAIMS

The undersigned, counsel to a Settlement Class of WARN Act claimants so certified by this Court, declares as follows, under penalty of perjury:

1. On September 14, 2018, this Court entered an Order preliminarily approving a Settlement Agreement¹ entered into by and among Mark Calvert (the “Trustee”) on behalf of Northwest Territorial Mint, LLC (the “Debtor”) and Brittany Konkel (“Class Claimant”) (the “Preliminary Approval Order” Doc. 1880).

2. In accordance with the Settlement Agreement, the undersigned mailed the Court approved Class Notice to Settlement Class Members by first-class mail at their last known addresses on September 18, 2018.

¹ Capitalized terms utilized but not otherwise defined in this Declaration shall have the meanings ascribed to them in the Settlement Agreement.

1 3. The Preliminary Approval Order provided that the deadline for Settlement Class
2 Members to opt-out of the Settlement was November 2, 2018. The opt-out deadline was included in
3 the Class Notice.

4 4. The Preliminary Approval Order also provided that the deadline for Settlement Class
5 Members to object to the settlement would be set at 45 days from the date of mailing (which was
6 also November 2, 2018). The objection deadline was included in the Class Notice.

7 5. As of today's date, the deadline for Settlement Class Members to opt-out or object to
8 the Settlement has passed. Undersigned has received no opt-outs or objections.

9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
10 correct.
11

12 DATED this 6th day of November, 2018, at Mobile, Alabama.
13

14
15 /s/ Mary E. Olsen
16 Mary E. Olsen, *pro hac vice*
17 182 St. Francis Street, Suite 103
18 Mobile, AL 36602
19 P: (251) 433-8100
20 F: (251) 433-8181

21 *Attorney for Brittany Konkel, Class Claimant*
22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all recipients of ECF electronic notices in this action.

I declare under the penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED at Seattle, Washington on November 7, 2018.

s/Irina Kinyon, PP

Irina Kinyon, PP

Paralegal

CFL LAW GROUP, LLP

1001 Fourth Avenue, Suite 3900

Seattle, Washington 98154

(206) 292-8800 phone

ikinyon@correronin.com